12/10/00 20/10/00

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JACK MARRONE, Husband, KAREN MARRONE, Wife,

Both Individually and in Their Capacity

as Parents and Guardians for VIDA MARRONE, a Minor

Plaintiffs

: CIVIL ACTION - LAW

JURY TRIAL DEMANDED

JUDGE KANE

1:CV-01-0773

FILED HARRISBURG, PA

DEC 0 9 2002

ALLSTATE INSURANCE COMPANY, LINDA M. EDLEMAN, FRED SCHAEFFER, MT. GRETNA REALTY and

HOUSE MASTERS,

Defendants

RESPONSE OF DEFENDANTS FRED SCHAEFFER AND MT. GRETNA REALTY TO THE PLAINTIFFS' MOTION TO PERMIT THE FILING OF PLAINTIFFS' MEDICAL CAUSATION EXPERT REPORTS NUNC PRO TUNC

Defendants, Fred Schaeffer and Mt. Gretna Realty, by and through their counsel, Fine, Wyatt & Carey, P.C., hereby responds to the Plaintiffs' Motion to Permit the Filing of Plaintiffs' Medical Causation Expert Reports Nunc Pro Tunc as follows:

Answering Defendants incorporate by reference Paragraphs 1-27 and 32-34 of the Response 1. of Defendant Linda M. Edleman to the Plaintiffs' Motion to Permit the Filing of Plaintiffs' Medical Causation Expert Reports Nunc Pro Tunc.

WHEREFORE, Defendants Fred Schaeffer and Mt. Gretna Realty respectfully request that this Honorable Court deny the Plaintiffs' Motion to Permit the Filing of Plaintiffs' Medical Causation Expert Reports Nunc Pro Tunc and direct that the parties comply with the deadlines previously set forth in the Court's Order of July 5, 2002.

Respectfully submitted,

FINE, WYATT & CAREY, P.C.

Bv:

Edward A. Monsky, Esquip

I.D. #37625

Attorneys for Defendants

Fred Schafer and Mt. Gretna Realty

425 Spruce St., 4th Fl. Scranton, PA 18503 (570) 343-1197

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JACK MARRONE, Husband,

KAREN MARRONE, Wife,

Both Individually and in Their Capacity

as Parents and Guardians for

VIDA MARRONE, a Minor and

MATTHEW ADAM MARRONE

Plaintiffs

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ALLSTATE INSURANCE COMPANY, LINDA M. EDLEMAN, FRED SCHAEFFER,

MT. GRETNA REALTY and

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Defendants

CERTIFICATE OF SERVICE

I, EDWARD A. MONSKY, ESQUIRE, hereby certify that I forwarded a true and correct copy of the foregoing Response of Defendants Fred Schaeffer and Mt. Gretna Realty to the Plaintiffs' Motion to Permit the Filing of Plaintiffs' Medical Causation Expert Reports Nunc Pro Tunc upon the following individuals by first class U.S. Mail, postage prepaid, on the day of December, 2002:

> Louis M. Tarasi, Esquire Tarasi, Tarasi & Fishman, P.C. 510 Third Ave. Pittsburgh, PA 15219

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FINE, WYATT & CAREY, P.C.